

8-017 2008 PITSEA TRAVELLER
STATEMENT OF
NEED

SouthWestLaw

(Legal Services in the Community) Ltd

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Our Ref: BCC/dmj/O163/3

Your Ref:

Date: 15 April 2008

Please ask for: Brian Cox

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jones@southwestlaw.org.uk

Dear Granton

Kate O'Brien

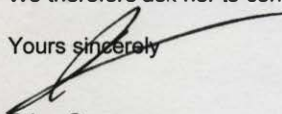
Kate wasn't available to see me when I came up to Pitsea. I do enclose a copy of the statement which we had from her at the last hearing. In addition, as a firm we were doing our best to help to make sure that the support for the two girls was continuing, unfortunately Kate did not give us any further instructions and we closed the file.

I now see with some major concern that the eldest daughter, assume Lavinia no longer attends school because of the reports in the paper and there is now a request for home tuition.

As you know, as a firm, we do specialise in working with children with special educational needs and I thought we may be able to arrange a good support for Kathleen and if that now has not happened it is absolutely vital that she contacts us and speaks to either myself or my colleague, who is also Kate O'Brien to make sure we give the right support. - v r b e n r c y

We therefore ask her to contact us as a matter of extreme urgency.

Yours sincerely


Brian Cox
SouthWestLaw

Enc

Community
Legal Service



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PERSONAL CIRCUMSTANCES
KATE O'BRIEN

1. I am a Gypsy and I live on Plot 30 Oak Road, Dale Farm.
2. I am a single parent and I have three children; Lavina age 12; Ellen age 10 and Journey age 7.
3. My mother and father in law Jeremiah and Jane O'Brien also live on the plot with me with their daughter Mary who is 26.
4. I have travelled with my in law's for many years now although my husband left the family in 2002. We are a very close family group and we rely on each other for help and support. In particular my sister in law helps me with the children and I have come to rely on the help and support that she gives me.
5. My daughter Lavina is profoundly deaf and has a statement of Special Educational Needs. She attends the special unit for hearing impaired pupils attached to Swayne Park School at Rayleigh. In addition to her specific hearing problem she has difficulties reading and writing. She has a reading age of a 6 ½ year old and consequently needs a lot of extra help and support at school.
6. My daughter Ellen also has severe hearing problems and attends the special unit attached to Ghyigrove Primary School. She has to use a radio aid and has two hearing aids. She also needs extra help and support at school.
7. I attach a copy of Lavina's statement of special educational needs and other information from the school which detail the help and support that they both need as exhibit KOB1. Each of them has a structured support system which cannot easily be transferred between schools and I would be very concerned as to what would happen to their education if we are not allowed to remain on the appeal site. We do not have anywhere else to go and if we cannot stay on this land they

will not be able to regularly attend school as we will be forced to constantly move around. Their educational progress has already suffered in the past as they have not been able to regularly attend school and have their needs addressed. They are now both in schools which have a special unit for hearing impaired pupils with personalised support programmes in place to meet their needs and their education would suffer significantly if they cannot continue to attend these schools.

8. Whilst my two daughters still have statement of special educational needs and are getting extra support this does depend very much on the fact that they are in Essex and do not have a settled base and therefore if moved I would be in a very difficult position in making sure that they attend school.
9. The support from LEA continues although there remains a degree of dispute about the support they receive.
10. My son Jourmy attends Cray's Hill Primary School. He has a weakness in his literacy skills and he too will suffer if he is not able to regularly attend school to receive the education that he needs and is entitled to.
11. We are all registered with the doctors. My father in law Jeremiah suffers from Angina and high blood pressure and has to take regular medication for these. He also has a serious stomach problem which causes him extreme pain and he is prescribed morphine for this. My mother in law, Jane, also has significant health problems, she has already had a heart attack and is in need of a settled base and support from the doctor.
12. If we are not granted permission to remain on the land the Council will evict us. If we are evicted we do not have anywhere else that we can go. There are no spaces on any existing sites or any available land that we can afford to purchase. We will be homeless and forced to live on the roadside, moving from one illegal encampment to another. We will then be unable to access the health care that we

need and the children will be unable to attend school and this will have a seriously detrimental effect on their progress.

13. I therefore request that planning permission is granted for myself and my family to live on our land at least until an alternative site can be found for us.

Kate O'Brien

Dated this day of April 2008